

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

YOLANDA WILLIAMS	:	CIVIL ACTION
	:	
v.	:	
	:	
E-MAX SOLUTIONS, PARTNERS,	:	
INC., A SCIQUEST.COM COMPANY	:	
and	:	
JEB CONNOR, JIM KELLER,	:	
JAMES FIELDS	:	NO. 02-cv-3682

DEFENDANTS' SELF-EXECUTING DISCLOSURES

**I. The Name and Last Known Address of Each Person
Reasonably Likely to Have Information That Bears
Significantly on the Claims and Defenses**

Jeb Connor
c/o Sweeney & Sheehan
1515 Market Street, 19th Floor
Philadelphia, PA 19102

James Keller
c/o Sweeney & Sheehan
1515 Market Street, 19th Floor
Philadelphia, PA 19102

James Fields
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073
and
c/o Sweeney & Sheehan
1515 Market Street, 19th Floor
Philadelphia, PA 19102

Barb Blessing
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Kim Danforth
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Laura Daley
70 Cherry Circle
Blackwood, NJ 08012

Scott Gaul
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Jeri Hoyt
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Pete Keavney
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Bob O'Hara
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Mark Robillard
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

Steve Whitley
c/o EMAX Solutions
17 Campus Boulevard
Newtown Square, PA 19073

**II. A General Description of All Documents, Data, Compilations,
and Tangible Things Likely to Bear Significantly On the
Claims and Defenses**

1. Personnel file of Yolanda Williams.
2. All additional personnel documents regarding Yolanda Williams.
3. Yolanda Williams performance reviews.
4. Sexual harassment training records.
5. Sexual harassment training documents.
6. EMAX Standard Operating Procedures.

III. The Existence and Contents Of Any Insurance Agreement

EMAX Solutions Inc., A SCIQUEST.COM Company has a policy of insurance with Genesis Underwriting Management Company with effective dates from April 1, 2000 to April 1, 2001, policy number ZXB002381A a liability limit of \$2,000,000.00 aggregate coverage per coverage year. Each claim is subject to a \$25,000 self-insured retention.

SWEENEY & SHEEHAN

By: _____
Barbara A. O'Connell
Identification No. 46461
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Philadelphia, PA 19102
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Attorney for Defendants